KRAMER LEVIN NAFTALIS & FRANKEL LLP Kenneth H. Eckstein Rachael Ringer Caroline F. Gange 1177 Avenue of the Americas New York, New York 10036 Telephone: (212) 715-9100

Fax: (212) 715-8000

Attorneys for the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORI		
In re:	:	Chapter 11
PURDUE PHARMA L.P, et al.,	:	Case No. 19-23649 (RDD)
Debtors. <sup>1</sup>	:	
	:	

ELEVENTH MONTHLY FEE STATEMENT OF KRAMER LEVIN NAFTALIS & FRANKEL LLP, CO-COUNSEL TO THE AD HOC COMMITTEE, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM AUGUST 1, 2020 THROUGH AUGUST 31, 2020

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant	Kramer Levin Naftalis & Frankel LLP
Authorized to Provide Professional	Ad Hoc Committee of Governmental and Other
Services to:	Contingent Litigation Claimants
Date of Order Approving Debtors'	December 2, 2019
Payment of Fees and Expenses of	
Applicant:	
Period for which compensation and	August 1, 2020 through and including
reimbursement is sought	August 31, 2020
Amount of Compensation sought as actual,	\$319,182.00
reasonable, and necessary	
<b>Current Fee Request</b>	\$255,345.60
	(80% of \$319,182.00)
<b>Amount of Expense Reimbursement sought</b>	\$22,816.40
as actual, reasonable, and necessary:	
<b>Amount of Compensation and Expenses</b>	\$278,162.00
sought as allowed under the Fee Order	
<b>Total Fees and Expenses Inclusive of</b>	\$341,998.40
Holdback	
This is $a(n)$ : $\underline{X}$ monthlyintering	n applicationfinal application

## SUMMARY OF MONTHLY FEE STATEMENTS

Application		pensation and Period Covere		Total Amount Fee Statements	4	Total Unpaid
Date Filed/ Docket No.	Period Covered	Total Fees	Expenses	Fees (80%)	Expenses (100%)	Fees and Expenses
12/9/2019	9/16/2019- 10/31/2019	\$1,099,075.50	\$30,479.64	\$879,260.40	\$30,479.64	\$0.00
1/30/2020 792	11/1/2019- 11/30/2019	\$688,772.25	\$4,206.77	\$551,017.80	\$4,206.77	\$0.00
3/16/2020 930	12/1/2019- 12/31/2019	\$451,659.00	\$8,050.70	\$361,327.20	\$8,050.70	\$0.00
3/16/2020 939	1/1/2020- 1/31/2020	\$395,585.50	\$4,712.17\$	\$316,468.40	\$4,712.17	\$0.00
5/5/2020 1131	2/1/2020- 2/29/2020	\$432,757.50	\$3,439.62	\$346,206.00	\$3,439.62	\$0.00
6/15/2020 1269	3/1/2020- 3/31/2020	\$370,398.50	\$51,598.57	\$296,318.80	\$51,598.57	\$0.00
7/14/2020 1389	4/1/2020- 4/30/2020	\$476,681.00	\$5,989.84	\$381,344.80	\$5,989.84	\$0.00
7/15/2020 1413	5/1/2020- 5/31/2020	\$298,077.50	\$31,689.62	\$238,636.00	\$31,689.62	\$0.00
9/25/2020 1727	6/1/2020- 6/30/2020	\$413,601.00	\$4,238.27	\$330,880.80	\$4,238.27	\$82,720.20
11/2/2020 1888	7/1/2020- 7/31/2020	\$408,012.00	\$3,537.82	\$326,409.60	\$3,537.82	\$411,549.82

Pursuant to sections 363(b) and 365 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals [Docket No. 553] (the "Fee Order"), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 529] (the "Interim Compensation Order," and together with the Fee Order, the "Orders"), Kramer Levin Naftalis & Frankel LLP (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the "Ad Hoc Committee"), hereby submits this Eleventh Monthly Fee Statement (the "Statement") for the period of August 1, 2020 through and including August 31, 2020 (the "Monthly Fee Period").

#### **Itemization of Services Rendered by Applicant**

Annexed hereto as "**Exhibit A**" is a schedule of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Monthly Fee Period by project category. Annexed hereto as "**Exhibit B**" is a schedule of the individuals and their respective titles that provided services during this Monthly Fee Period, along with their respective billing rates and the total number of hours spent by each individual during this Monthly Fee Period. The blended hourly billing rate of attorneys for all services provided during the Monthly Fee Period is \$1,044.88.<sup>2</sup> The blended hourly billing rate of all paraprofessionals is \$420.90.<sup>3</sup>

Annexed hereto as "Exhibit C" is a schedule of the actual, necessary expenses that Applicant incurred during the Monthly Fee Period.

<sup>&</sup>lt;sup>2</sup> The blended hourly rate for all attorneys was derived by dividing the total fees for such professionals of \$317,330.00 by the total hours of 303.70.

<sup>&</sup>lt;sup>3</sup> The blended hourly rate for all paraprofessionals was derived by dividing the total fees for such paraprofessionals of \$1,852.00 by the total hours of 4.40.

Annexed hereto as "**Exhibit D**" are the time records of Applicant for this Monthly Fee Period organized by project category with a daily time log explaining the time spent by each attorney and other professional and an itemization of expenses.

In accordance with the Fee Order, Applicant has separately recorded work performed relating to allocation of value among the Debtors' creditors, and, to the best of its knowledge, Applicant has not included time relating to such allocation in this Application.<sup>4</sup>

#### Notice

Applicant will provide notice of this Application in accordance with the Orders.

Applicant submits that no other or further notice be given.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Statement, serve via email, to the Notice Parties (as defined in the Interim Compensation Order), a written notice setting forth the precise nature of the objection and the amount at issue.

If no objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Applicant an amount equal to 80% of the fees and 100% of the expenses incurred during the Monthly Fee Period.

If an objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Applicant an amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

<sup>&</sup>lt;sup>4</sup> Applicant may request fees related to allocation among creditors at a later date by separate motion.

WHEREFORE, Applicant respectfully requests (i) compensation in the amount of \$255,345.60, which represents 80% of billable time for services rendered by Applicant as co-counsel to the Ad Hoc Committee during this Monthly Fee Period, and (ii) reimbursement of the actual, necessary expenses incurred and recorded by Applicant during this Monthly Fee Period in the amount of \$22,816.40.

Dated: New York, New York November 16, 2020 Respectfully submitted,

By: /s/ Kenneth H. Eckstein

Kenneth H. Eckstein Rachael Ringer Caroline F. Gange KRAMER LEVIN NAFTALIS & FRANKEL LLP

1177 Avenue of the Americas New York, New York 10036 Telephone: (212) 715-9100

Fax: (212) 715-8000

Emails: keckstein@kramerlevin.com rringer@kramerlevin.com cgange@kramerlevin.com

Attorneys for the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

19-23649-shl Doc 1987 Filed 11/16/20 Entered 11/16/20 21:24:24 Main Document Pg 7 of 62

## **EXHIBIT A**

# SUMMARY OF FEES BY PROJECT CATEGORY

Matter	Matter Name	Hours	Total
00001	Asset Analysis and Recovery	122.50	\$124,833.00
00004	Case Administration	2.50	\$2,644.00
00005	Claims Analysis	35.90	\$41,957.00
00006	Employment and Fee Applications	23.10	\$18,105.50
00008	Litigation	33.40	\$38,715.00
00009	Meetings and Communications with Ad- Hoc Committee & Creditors	57.80	\$58,527.50
00011	Plan and Disclosure Statement	32.90	\$34,400.00
TOTAL		308.10	\$319,182.00

## **EXHIBIT B**

## SUMMARY OF PROFESSIONALS FOR THE MONTHLY FEE PERIOD

Timelroom on	Title	Year Admitted	Domontonout	Hourly Billing Rate	Total Hours Billed	Total Fees
Timekeeper	Tiue	Admitted	Department	Kate	Billea	10tai rees
John Bessonette	Partner	1999	Camaanata	¢1225	1.00	¢1 225 00
Kenneth H.	Partner	1999	Corporate Creditors'	\$1225	1.00	\$1,225.00
Eckstein	Partner	1980	Rights	1500	49.70	\$74.550.00
Jeffrey	Partiler	1980	Rights	1300	49.70	\$74,550.00
Trachtman	Partner	1985	Litigation	1325	1.00	\$1,325.00
Rachael	1 dither	1703	Creditors'	1323	1.00	Ψ1,323.00
Ringer	Partner	2011	Rights	1150	44.10	\$50,715.00
Jordan M.			5	1200		1 - 2 - 2 - 2 - 2 - 2
Rosenbaum	Partner	2004	Corporate	1200	5.10	\$6,120.00
David E.			Creditors'			
Blabey	Counsel	2005	Rights	1050	34.10	\$35,805.00
Helayne O.						
Stoopack	Counsel	1982	Tax	1075	12.00	\$12,900.00
			Creditors'			
Hunter Blain	Associate	2020	Rights	585	11.50	\$6,727.50
Elise						
Funke	Associate	2018	Litigation	770	32.80	\$25,256.00
Caroline		2015	Creditors'	0.40		474 020 00
Gange	Associate	2017	Rights	840	61.70	\$51,828.00
Mariya Khvatskaya	Associate	2016	Tax	905	9.80	\$8,869.00
Ilya	Associate	2010	1 ax	903	9.00	\$6,609.00
Kontorovich	Associate	2014	Corporate	905	3.90	\$3,529.50
Seth			<u> </u>			1292
Schinfeld	Associate	2007	Litigation	1040	37.00	\$38,480.00
Jessica						
Halpert	Paralegal	N/A	Litigation	430	0.40	\$172.00
			Creditors'	400	4.00	h1 500 00
Wendy Kane	Paralegal	N/A	Rights	420	4.00	\$1,680.00
	Total				308.10	\$319,182.00

19-23649-shl Doc 1987 Filed 11/16/20 Entered 11/16/20 21:24:24 Main Document Pg 11 of 62

## **EXHIBIT C**

## SUMMARY OF OUT OF POCKET EXPENSES

DESCRIPTION	AMOUNT
Court Solutions	\$210.00
Data Hosting Charges	401.20
Lexis Online Research	222.39
Telecommunication Charges	8,854.63
Transcript Fees	105.60
PACER Online Research	37.70
Westlaw Online Research	12,984.88
TOTAL EXPENSES	\$22,816.40

## **EXHIBIT D**

## Kramer Levin



November 16, 2020

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 810939 072952 Page 1

#### FOR PROFESSIONAL SERVICES rendered through August 31, 2020.

Fees \$319,182.00

Disbursements and Other Charges 22,816.40

TOTAL BALANCE DUE \$341,998.40

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339



#### **MATTER SUMMARY**

## For professional services rendered through August 31, 2020 in connection with the following matters:

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$124,833.00	\$22,816.40	\$147,649.40
072952-00004	Case Administration	2,644.00	0.00	2,644.00
072952-00005	Claims Analysis	41,957.00	0.00	41,957.00
072952-00006	Employment and Fee Applications	18,105.50	0.00	18,105.50
072952-00008	Litigation	38,715.00	0.00	38,715.00
072952-00009 Meetings and Communications with Ad-Hoc Committee & Creditors		58,527.50	0.00	58,527.50
072952-00011	Plan and Disclosure Statement	34,400.00	0.00	34,400.00
Subtotal 319,182.00 22,816.40				341,998.40
TOTAL CURRENT	\$341,998.40			



## **Asset Analysis and Recovery**

#### **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	14.70	\$22,050.00
Ringer, Rachael L.	Partner	15.30	17,595.00
Rosenbaum, Jordan M.	Partner	0.60	720.00
Trachtman, Jeffrey S.	Partner	1.00	1,325.00
Blabey, David E.	Counsel	9.90	10,395.00
Stoopack, Helayne O.	Counsel	2.30	2,472.50
Blain, Hunter	Associate	1.00	585.00
Funke, Elise	Associate	31.20	24,024.00
Gange, Caroline	Associate	10.70	8,988.00
Khvatskaya, Mariya	Associate	4.10	3,710.50
Schinfeld, Seth F.	Associate	31.70	32,968.00
TOTAL FEES		122.50	\$124,833.00

#### **DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Data Hosting Charges	\$401.20
Lexis Online Research	222.39
Pacer Online Research	37.70
Telecommunication Charges	8,854.63
Telephonic Court Appearances	210.00



## **Asset Analysis and Recovery**

DESCRIPTION	AMOUNT
Transcript Fees	105.60
Westlaw Online Research	12,984.88
TOTAL DISBURSEMENTS AND OTHER CHARGES	\$22,816.40

#### **PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/3/2020	Schinfeld, Seth F.	Review emails from UCC re: information sharing side letter and common interest and joint defense agreement.	0.30	\$312.00
8/3/2020	Gange, Caroline	Emails w/ FTI re information sharing updates.	0.20	168.00
8/3/2020	Funke, Elise	Review S. Schinfeld correspondence re discovery (0.5), discuss document review with KL team (0.5), correspond with KL team regarding follow up questions re discovery (0.2).	1.20	924.00
8/4/2020	Ringer, Rachael L.	Emails with FTI and KL team re: diligence issues/updates (0.5).	0.50	575.00
8/4/2020	Schinfeld, Seth F.	Email with R. Ringer and E. Funke re: status of discovery (0.2); email with M. Hurley and K. Porter of UCC re: information sharing protocol logistics and next steps (0.2).	0.40	416.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/5/2020	Schinfeld, Seth F.	Call with UCC attorneys (A. Preis, M. Hurley, K. Porter) and E. Funke re: information sharing protocol (0.4); Follow-up communications with E. Funke re: same (0.3); email with R. Ringer re same (0.1).	0.80	832.00
8/5/2020	Funke, Elise	Prepare for (0.1) and participate in call (0.4) with KL and Akin teams re: discovery and diligence review issues.	0.50	385.00
8/6/2020	Eckstein, Kenneth H.	Correspond with R. Ringer re discovery (0.4).	0.40	600.00
8/6/2020	Ringer, Rachael L.	Prepare for (0.1) and attend call (0.4) with discovery KL team re: next steps and assignments for litigation review issues; follow-up emails w/ KL team re same (0.3).	0.80	920.00
8/6/2020	Khvatskaya, Mariya	Review proposed regulations re tax issues.	1.90	1,719.50
8/6/2020	Schinfeld, Seth F.	Call with R. Ringer, C. Gange, and E. Funke re: discovery and diligence review issues (0.5); follow up emails re: same (0.2).	0.70	728.00
8/6/2020	Gange, Caroline	Attend diligence update call w/R. Ringer and S. Schinfeld.	0.50	420.00
8/7/2020	Eckstein, Kenneth H.	Call with A Troop re: discovery issues (0.5); call with A Preis re UCC stip and discovery protocol (0.3); review and revise same (0.4); call with M. Cyganowski re same (0.3).	1.50	2,250.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/7/2020	Schinfeld, Seth F.	Email with R. Ringer, E. Funke, and FTI professionals re: diligence on Sackler cash transfers (0.3); review letter from Millbank to the UCC re: discovery disputes (0.2).	0.50	520.00
8/7/2020	Gange, Caroline	Review FTI update re Sackler cash transfers (0.4); attend call w/ KL and FTI re same (0.5).	0.90	756.00
8/7/2020	Khvatskaya, Mariya	Review recent reports on tax structure issues.	1.20	1,086.00
8/7/2020	Funke, Elise	Attend call with KL attorneys and FTI, HL re: cash transfers (0.5); draft summary of call for KL team (0.2).	0.70	539.00
8/9/2020	Schinfeld, Seth F.	Email to K. Porter re: discovery issues (0.1); email with R. Ringer and E. Funke re: same (0.2); review of legal research on potential estate claims and related emails with E. Funke (0.8).	1.10	1,144.00
8/10/2020	Schinfeld, Seth F.	Draft and revise slides for presentation to AHC re: potential estate claims investigation (1.7); email with R. Ringer and E. Funke re: same (0.3).	2.00	2,080.00
8/10/2020	Gange, Caroline	Emails w/ DPW, IAC counsel and FTI re information sharing updates.	0.40	336.00
8/10/2020	Khvatskaya, Mariya	Review recent report on tax issues.	0.20	181.00
8/10/2020	Funke, Elise	Review correspondence from KL team re discovery (0.2); review discovery presentation for clients (0.2).	0.40	308.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/11/2020	Ringer, Rachael L.	Emails with FTI re: diligence letter (0.3).	0.30	345.00
8/11/2020	Schinfeld, Seth F.	Email with K. Porter of Akin (UCC) re: discovery issues (0.2); review past discovery dispute correspondence to Court (0.5); review draft stipulation re: standing to prosecute claims related to Debtors' insurance coverage (0.2); review portions of appellate decision re preliminary injunction (0.2).	1.10	1,144.00
8/11/2020	Gange, Caroline	Multiple emails with FTI/DPW re information sharing updates (0.4); review FTI draft diligence presentation (0.2); organize attendance for Milbank presentation (0.2).	0.80	672.00
8/11/2020	Khvatskaya, Mariya	Communications with H. Stoopack regarding tax issues.	0.10	90.50
8/12/2020	Stoopack, Helayne O.	Emails B. Kelly, R. Ringer re: DPW settlement structure.	0.20	215.00
8/12/2020	Schinfeld, Seth F.	Email with R. Ringer and E. Funke re: discovery issues (0.3); email with M. Diaz and B. Bromberg of FTI re: same (0.1); call with M. Diaz, B. Bromberg, C. Gange re: same (0.3).	0.70	728.00
8/12/2020	Funke, Elise	Attend Millbank presentation planning call (0.5).	0.50	385.00
8/12/2020	Khvatskaya, Mariya	Draft issues list on tax issues.	0.70	633.50



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/12/2020	Gange, Caroline	Review FTI draft business plan update (0.2); call w/ FTI and S. Schinfeld re discovery update (0.5); emails w/ AHC members re Sackler sources and uses presentation (0.5).	1.20	1,008.00
8/12/2020	Funke, Elise	Correspond with FTI re: Milbank/Sackler presentation to AHC.	0.10	77.00
8/13/2020	Rosenbaum, Jordan M.	Attend portions of Sackler/Milbank presentation.	0.60	720.00
8/13/2020	Eckstein, Kenneth H.	Attend AHC advisors call re diligence issues (1.3); attend Sackler presentation re sources and uses of funds (2.0).	3.30	4,950.00
8/13/2020	Stoopack, Helayne O.	Attend AHC tax group call (0.5); call with M. Khvatskaya re: same (0.2); call with AHC tax group and DPW tax (0.7); call with B. Kelly re: same (0.2).	1.60	1,720.00
8/13/2020	Schinfeld, Seth F.	Review emails re: deposition of S. Baker (0.2); review portions of presentation on Raymond Sackler-Side Cash & Non-Cash Transactions (0.3); email with E. Funke re: presentation (0.1).	0.60	624.00
8/13/2020	Gange, Caroline	Attend Sackler sources and uses presentation (0.9); multiple emails w/ AHC counsel re same (0.6); review/ FTI/Province letter re IAC diligence (0.2).	1.70	1,428.00
8/13/2020	Funke, Elise	Attend Sackler presentation (0.9), draft summary of presentation for KL team (0.1).	1.00	770.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/14/2020	Schinfeld, Seth F.	Email with M. Diaz of FTI re: financial presentation.	0.10	104.00
8/15/2020	Schinfeld, Seth F.	Emails with K. Porter, E. Parlar (UCC) re: discovery issues (0.2); email with E. Baldeon and J. Ranson re: document production issues (0.2).	0.40	416.00
8/16/2020	Schinfeld, Seth F.	Review recent document productions (0.8); call with E. Funke re: same (0.5); email with E. Funke re: same (0.1).	1.40	1,456.00
8/16/2020	Funke, Elise	Call with S. Schinfeld re: doc review (0.5), further communications w/ S. Schinfeld re same (0.1).	0.60	462.00
8/17/2020	Schinfeld, Seth F.	Continued review of recent document productions to analyze potential estate claims (3.4): email with E. Funke re: same (0.2); email with J. Ranson and E. Baldeon re: database issue (0.1).	3.70	3,848.00
8/17/2020	Funke, Elise	Review hot document production from Akin.	2.70	2,079.00
8/18/2020	Schinfeld, Seth F.	Continued review of document productions to analyze potential estate claims (2.2); draft and revise slides summarizing categories of documents reviewed and related observations (1.1); email with E. Funke and/or C. Gange re: same (0.4); email to R. Ringer re: same (0.1).	3.80	3,952.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/18/2020	Funke, Elise	Review hot document production (4.0); review correspondence from KL team re: confidentiality of documents (0.2); edit client presentation re: hot documents (0.5); correspond with Akin attorneys re: production formatting (0.2).	4.90	3,773.00
8/18/2020	Gange, Caroline	Emails w/ S. Schinfeld re diligence updates (0.2).	0.20	168.00
8/19/2020	Eckstein, Kenneth H.	Call with G. Uzzi re Sackler diligence (0.8); review report re same (0.4).	1.20	1,800.00
8/19/2020	Schinfeld, Seth F.	Review UCC letter to mediation parties and related materials (0.3); continued review of recent document productions to analyze potential estate claims (0.8); email with R. Ringer and/or E. Funke re: discovery matters (0.2); review email from M. Hurley (UCC) re: S. Baker deposition (0.1); review UCC letter to Haug Partners re: discovery disputes and ongoing meet and confer efforts (0.2).	1.60	1,664.00
8/19/2020	Funke, Elise	Correspond and coordinate with KL tech services to load new production (0.1).	0.10	77.00
8/19/2020	Gange, Caroline	Review diligence update slides from S. Schinfeld (0.4); review FTI diligence update deck (0.2).	0.60	504.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/20/2020	Ringer, Rachael L.	Emails with Akin re: diligence questions/information sharing (0.4); attend all-hands deposition call w/ UCC, Debtors, NCSG (0.5).	0.90	1,035.00
8/20/2020	Eckstein, Kenneth H.	Call with AHC professionals re director depositions (1.0); review/revise proposed deposition protocol (0.8).	1.80	2,700.00
8/20/2020	Schinfeld, Seth F.	Review recent document productions to analyze potential estate claims (1.6); email with E. Funke re: same (0.1); Email with J. Ranson and F. Guerrero re: same (0.1); call with Paul Hastings, counsel to non-family directors, and UCC, NCGS, and Debtor representatives re: depositions (0.5); email with K. Porter (UCC) and/or R. Ringer and E. Funke re: deposition schedule (0.1).	2.40	2,496.00
8/20/2020	Funke, Elise	Download and organize productions (2.5); review correspondence from Haug and Milbank re: productions (0.5).	3.00	2,310.00
8/21/2020	Ringer, Rachael L.	Emails with S. Brauner re: diligence issues (0.2), call with S. Brauner re: same (0.1).	0.30	345.00
8/21/2020	Stoopack, Helayne O.	Review emails re: mediation and other updates.	0.50	537.50



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/21/2020	Schinfeld, Seth F.	Continued review of document productions to analyze potential estate claims (1.5); draft and revise slides summarizing the same (0.6); email with R. Ringer, C. Gange, and/or E. Funke re: discovery and diligence issues (0.3); email with B. Bromberg at FTI re: same (0.2); email with J. Ranson re: same (0.1); email with K. Porter (UCC) re: upcoming depositions (0.1); Review draft remote deposition protocol (0.2); review letter from Debtors to UCC re: mediation issues (0.1).	3.10	3,224.00
8/21/2020	Gange, Caroline	Emails w/ S. Schinfeld re diligence presentation.	0.10	84.00
8/24/2020	Ringer, Rachael L.	Attend call re: deposition prep issues (0.8), call with A. Troop and D. Blabey re: same (0.5), coordinate with AHC professionals re: diligence stipulation (0.4), coordinate with lit team re: discovery issues/productions (0.6).	2.30	2,645.00
8/24/2020	Eckstein, Kenneth H.	Attend call w/ UCC re deposition protocol (0.6).	0.60	900.00
8/24/2020	Blabey, David E.	Attend deposition prep session with Lexitas re upcoming Sackler deposition (0.8); review proposed deposition protocol order (0.4); call with KL and Pillsbury re upcoming deposition (0.5).	1.70	1,785.00
8/24/2020	Gange, Caroline	Review/revise discovery stipulation with UCC, NCSG and Debtors.	0.80	672.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/24/2020	Schinfeld, Seth F.	Review draft remote deposition protocol and draft scheduling stipulation (0.3), and email with R. Ringer, A. Preis (UCC), M. Hurley (UCC), and others re: revisions to same (0.1).	0.40	416.00
8/25/2020	Eckstein, Kenneth H.	Call w/ Debtors, UCC re deposition protocol (0.8); follow up call w/ AHC counsel re deposition protocol (0.5); review stipulation with UCC and NCSG, comment (0.7); call with A. Troop re discovery (0.4); call with AHC and NCSG re developments in case and upcoming hearing (0.6); prep for court hearing (1.3); call with M. Huebner re hearing, case issues (0.4).	4.70	7,050.00
8/25/2020	Ringer, Rachael L.	Call with all parties re: deposition protocol (1.0), call with A. Troop re: same (0.4); finalize discovery stipulation with A. Preis (0.3), coordinate re: diligence updates with K. Eckstein (0.3).	2.00	2,300.00
8/25/2020	Blabey, David E.	Attend portion of call with case parties re deposition protocol (0.7), review and comment on discovery stipulation (0.1).	0.80	840.00
8/25/2020	Schinfeld, Seth F.	Review revisions to draft remote deposition protocol and draft scheduling stipulation (0.3); review of related email from E. Funke (0.2).	0.50	520.00
8/25/2020	Funke, Elise	Review Sackler docs and related UCC letters (2.5); draft summary of relevant Sackler docs for KL attorney team (0.5).	3.00	2,310.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/25/2020	Gange, Caroline	Review/revise deposition scheduling order (0.8); emails w/R. Ringer and Akin re same (0.2).	1.00	840.00
8/26/2020	Ringer, Rachael L.	Review remote deposition protocol, emails with KL team re: same (0.5), finalize same, emails with all parties re: same (0.3), draft email to AHC re: deposition protocol and updates (0.6), follow-up call with AHC professionals re: updates/issues (0.5), draft exhibit A to depo protocol for AHC, emails with AHC members re: same (0.4).	2.30	2,645.00
8/26/2020	Blabey, David E.	Review edits to remote deposition protocol (0.1); call with AHC counsel re upcoming depos (0.5).	0.60	630.00
8/26/2020	Schinfeld, Seth F.	Emails with R. Ringer, D. Blabey, C. Gange, and E. Funke re: discovery matters (0.3); review emails from UCC, NSCG, and other counsel re: revisions to draft remote deposition protocol (0.5); email with E. Parlar re: document productions (0.1).	0.90	936.00
8/26/2020	Funke, Elise	Organize document productions from Akin.	2.00	1,540.00
8/26/2020	Gange, Caroline	Emails w/ AHC members and R. Ringer re David Sackler depo and prep for same (0.4); review/revise remote depo protocol and emails w/ R. Ringer and D. Blabey re same (0.4).	0.80	672.00
8/27/2020	Ringer, Rachael L.	Finalize discovery/depo protocol (0.3).	0.30	345.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/27/2020	Blain, Hunter	Register AHC attendees for depositions (0.5), research and emails with KL team regarding same (0.3), further communications with KL team and Lexitas regarding depositions (0.2).	1.00	585.00
8/27/2020	Schinfeld, Seth F.	Email with E. Funke re: upcoming depositions and discovery matters (0.2); Email with A. Preis and K. Porter re: same (0.2).	0.40	416.00
8/27/2020	Gange, Caroline	Emails w/ AHC counsel re David Sackler depo.	0.30	252.00
8/28/2020	Ringer, Rachael L.	Attend portion of Sackler deposition (2.6), call with K. Eckstein re: same (0.1), discussions with D. Blabey re: same (0.3).	3.00	3,450.00
8/28/2020	Trachtman, Jeffrey S.	Review and comment on info sharing protocol (0.7).	0.70	927.50
8/28/2020	Blabey, David E.	Attend portions of D. Sackler deposition (6.5); discuss same with K. Eckstein, R. Ringer, and E. Funke (0.3).	6.80	7,140.00
8/28/2020	Schinfeld, Seth F.	Email with E. Funke and J. Ranson re: discovery matters (0.3); Email with R. Ringer, D. Blabey, and E. Funke re: David Sackler deposition (0.2); review email from counsel to S. Baker re: status of document productions (0.1).	0.60	624.00
8/28/2020	Funke, Elise	Draft summary of David Sackler deposition for KL attorney team (0.5); attend D. Sackler deposition (8.5).	9.00	6,930.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/29/2020	Trachtman, Jeffrey S.	Emails with KL bankruptcy team re info gathering protocol.	0.30	397.50
8/29/2020	Schinfeld, Seth F.	Review emails from K. Porter (UCC) re: David Sackler deposition and related discovery matters (0.2); review E. Funke's summary of David Sackler deposition (0.2).	0.40	416.00
8/30/2020	Ringer, Rachael L.	Review/revise update email re: David Sackler deposition (1.4).	1.40	1,610.00
8/30/2020	Schinfeld, Seth F.	Review communications between UCC and Sackler families (0.7); review portions of final execution version of remote deposition protocol stipulation and exhibit (0.2); review of recent document productions to analyze potential estate claims (0.4); email to E. Funke re: ongoing document review (0.1).	1.40	1,456.00
8/31/2020	Ringer, Rachael L.	Prepare presentation re: discovery updates for AHC (0.5), further revise presentation (0.7).	1.20	1,380.00
8/31/2020	Eckstein, Kenneth H.	Call with M. Huebner re injunction, follow up re same (0.4); review memo re discovery (0.2), review and revise same (0.4), correspond with KL team re same (0.2).	1.20	1,800.00



## **Asset Analysis and Recovery**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/31/2020	Schinfeld, Seth F.	Review email from R. Ringer re: David Sackler deposition testimony (0.2); email with R. Ringer, D. Blabey, C. Gange, and E. Funke re: status of estate claims discovery and related tasks (0.3); email with B. Cohen re: same (0.3); review of recent document productions (1.2); revise draft presentation slides re: same (0.4).	2.40	2,496.00
8/31/2020	Gange, Caroline	Review David Sackler deposition summary (0.3); review deposition docs re same (0.9).	1.20	1,008.00
8/31/2020	Funke, Elise	Review D. Sackler deposition transcript (0.5); draft summary of key deposition docs (1.0).	1.50	1,155.00
TOTAL	TOTAL			\$124,833.00

## **DISBURSEMENTS AND OTHER CHARGES DETAIL**

#### **Data Hosting Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
8/27/2020	Eckstein Kenneth H.	Data Hosting Charges	\$401.20
Subtotal			\$401.20

#### Lexis Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
8/18/2020	Boyle Brian	Lexis Online Research	\$222.39



## **Asset Analysis and Recovery**

Subtotal	\$222.39
----------	----------

#### **Telephonic Court Appearances**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
8/26/2020	Eckstein Kenneth H.	CourtSolutions	\$70.00
8/26/2020	Ringer Rachael L.	CourtSolutions	70.00
8/26/2020	Gange Caroline	CourtSolutions	70.00
Subtotal			\$210.00

#### **Pacer Online Research**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
6/1/2020	Blain Hunter	Pacer Online Research Blain, Hunter	\$0.30
8/11/2020	Blain Hunter	Pacer Online Research Blain, Hunter	\$14.10
8/19/2020	Blabey David E.	Pacer Online Research Blabey, Jr., David	\$20.80
8/20/2020	Blabey David E.	Pacer Online Research Blabey, Jr., David	\$1.10
8/20/2020	Blain Hunter	Pacer Online Research Blain, Hunter	0.70
8/24/2020	Lennard Daniel	Pacer Online Research Lennard, Daniel	\$0.70



## **Asset Analysis and Recovery**

Subtotal	\$37.70
----------	---------

#### **Telecommunication Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/3/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	\$236.39
2/5/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$338.43
2/6/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$9.06
2/9/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$70.90
2/10/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$280.91
2/11/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$140.00
2/12/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$169.23
2/13/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$12.57
2/13/2020	Blain Hunter	Telecommunication Charges by Hunter Blain	3.34
2/14/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	\$136.29
2/18/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$113.92
2/19/2020	Eckstein Kenneth H.	Telecommunication Charges by Jaclyn Ionin	\$0.24



2/19/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	213.36
2/20/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$9.72
2/20/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	4.02
2/21/2020	Blain Hunter	Telecommunication Charges by Hunter Blain	\$104.06
2/24/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$190.94
2/25/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$6.04
2/25/2020	Blain Hunter	Telecommunication Charges by Hunter Blain	3.75
5/1/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	\$295.96
5/4/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$229.64
5/4/2020	Wasson Megan	Telecommunication Charges by Megan Wasson	570.53
5/4/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	6.12
5/6/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$265.25
5/6/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	575.48
5/7/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$174.57
5/8/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$116.08



15.33	Telecommunication Charges by Mariya Khvatskaya	Khvatskaya Mariya	5/8/2020
\$271.79	Telecommunication Charges by Rachael Ringer	Ringer Rachael L.	5/11/2020
13.07	Telecommunication Charges by Mariya Khvatskaya	Khvatskaya Mariya	5/11/2020
135.26	Telecommunication Charges by Caroline Gange	Gange Caroline	5/11/2020
\$429.06	Telecommunication Charges by Rachael Ringer	Ringer Rachael L.	5/12/2020
\$18.37	Telecommunication Charges by Rachael Ringer	Ringer Rachael L.	5/13/2020
\$326.93	Telecommunication Charges by Rachael Ringer	Ringer Rachael L.	5/14/2020
16.53	Telecommunication Charges by Mariya Khvatskaya	Khvatskaya Mariya	5/14/2020
10.17	Telecommunication Charges by Alexis Wanzenberg	Wanzenberg Alexis	5/14/2020
107.14	Telecommunication Charges by Caroline Gange	Gange Caroline	5/14/2020
\$101.82	Telecommunication Charges by Caroline Gange	Gange Caroline	5/15/2020
\$27.29	Telecommunication Charges by Rachael Ringer	Ringer Rachael L.	5/17/2020
\$364.26	Telecommunication Charges by Rachael Ringer	Ringer Rachael L.	5/18/2020
136.87	Telecommunication Charges by Wendy Kane	Kane Wendy	5/18/2020
90.15	Telecommunication Charges by Caroline Gange	Gange Caroline	5/18/2020



5/19/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$12.43
5/20/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	\$42.80
5/21/2020	Khvatskaya Mariya	Telecommunication Charges by Mariya Khvatskaya	\$26.62
5/21/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	267.31
5/22/2020	Wanzenberg Alexis	Telecommunication Charges by Alexis Wanzenberg	\$12.46
5/24/2020	Fisher David J.	Telecommunication Charges by David Fisher	\$67.16
5/26/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$262.84
5/26/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	69.48
5/27/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$469.50
5/27/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	128.75
5/28/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$7.68
5/28/2020	Khvatskaya Mariya	Telecommunication Charges by Mariya Khvatskaya	7.34
5/29/2020	Wasson Megan	Telecommunication Charges by Megan Wasson	\$193.18
5/30/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$202.78
7/2/2020	Schinfeld Seth F.	Telecommunication Charges by Seth Schinfeld	\$25.22



8/3/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$105.14
8/5/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$133.55
8/6/2020	Ringer Rachael L.	Telecommunication Charges by Elise Funke	\$6.91
8/10/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$40.79
8/10/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	12.62
8/11/2020	Khvatskaya Mariya	Telecommunication Charges by Mariya Khvatskaya	\$0.32
8/11/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	5.41
8/12/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$12.31
8/13/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$11.27
8/13/2020	Khvatskaya Mariya	Telecommunication Charges by Mariya Khvatskaya	24.15
8/17/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$0.41
8/18/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$64.06
8/19/2020	Ringer Rachael L.	Telecommunication Charges by Rachael Ringer	\$226.06
8/26/2020	Gange Caroline	Telecommunication Charges by Caroline Gange	\$66.48
8/27/2020	Khvatskaya Mariya	Telecommunication Charges by Mariya Khvatskaya	\$6.16



# **Asset Analysis and Recovery**

Subtotal		\$8,854.63
8/31/2020	Telecommunication Charges by Rachel Goot	\$2.60

## **Transcript Fees**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
8/31/2020	Kane Wendy	Veritext New York Reporting Co., A Veritext Company	\$105.60
Subtotal			\$105.60

### **Westlaw Online Research**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
8/11/2020	Blain Hunter	Westlaw Online Research	\$321.84
8/12/2020	Lennard Daniel	Westlaw Online Research	\$106.54
8/13/2020	Lennard Daniel	Westlaw Online Research	\$319.61
8/14/2020	Lennard Daniel	Westlaw Online Research	\$90.89
8/14/2020	Friedman Leah	Westlaw Online Research	303.96
8/14/2020	Goot Rachel	Westlaw Online Research	485.75
8/15/2020	Goot Rachel	Westlaw Online Research	\$1,041.54
8/16/2020	Lennard Daniel	Westlaw Online Research	\$267.46
8/16/2020	Goot Rachel	Westlaw Online Research	373.99
8/17/2020	Lennard Daniel	Westlaw Online Research	\$106.54
8/17/2020	Goot Rachel	Westlaw Online Research	1,282.92



# **Asset Analysis and Recovery**

TOTAL			\$22,816.40
Subtotal			\$12,984.88
8/28/2020	Goot Rachel	Westlaw Online Research	\$319.61
8/27/2020	Blabey David E.	Westlaw Online Research	\$428.39
8/26/2020	Goot Rachel	Westlaw Online Research	\$106.54
8/25/2020	Goot Rachel	Westlaw Online Research	2,010.80
8/25/2020	Friedman Leah	Westlaw Online Research	1,981.75
8/25/2020	Lennard Daniel	Westlaw Online Research	106.54
8/25/2020	Blabey David E.	Westlaw Online Research	\$213.07
8/24/2020	Goot Rachel	Westlaw Online Research	197.43
8/24/2020	Friedman Leah	Westlaw Online Research	\$213.07
8/22/2020	Lennard Daniel	Westlaw Online Research	\$106.54
8/20/2020	Blabey David E.	Westlaw Online Research	\$213.07
8/19/2020	Goot Rachel	Westlaw Online Research	482.77
8/19/2020	Blabey David E.	Westlaw Online Research	\$319.61
8/18/2020	Goot Rachel	Westlaw Online Research	945.43
8/18/2020	Lennard Daniel	Westlaw Online Research	\$639.22



### **Case Administration**

## **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	0.80	\$1,200.00
Ringer, Rachael L.	Partner	1.00	1,150.00
Kane, Wendy	Paralegal	0.70	294.00
TOTAL FEES		2.50	\$2,644.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/7/2020	Eckstein, Kenneth H.	Review recently filed pleadings and AHC professionals' correspondence re case updates (0.8).	0.80	\$1,200.00
8/11/2020	Kane, Wendy	Review docket and update internal case records (0.2).	0.20	84.00
8/13/2020	Ringer, Rachael L.	Call w/ AHC counsel re: case issues/WIP (1.0).	1.00	1,150.00
8/25/2020	Kane, Wendy	Emails w/ C. Gange and M. Diaz re dial in line for hearing and Court Solutions account (0.2); email K. Eckstein and R. Ringer re dial in credentials and agenda (0.1).	0.30	126.00
8/31/2020	Kane, Wendy	Review deposition transcripts and exhibits and update case files re same (0.1); emails w/ C. Gange and H. Blain re same (0.1).	0.20	84.00
TOTAL			2.50	\$2,644.00



## **Claims Analysis**

## **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	12.00	\$18,000.00
Ringer, Rachael L.	Partner	9.40	10,810.00
Blabey, David E.	Counsel	5.40	5,670.00
Stoopack, Helayne O.	Counsel	0.40	430.00
Blain, Hunter	Associate	0.20	117.00
Gange, Caroline	Associate	8.00	6,720.00
Kane, Wendy	Paralegal	0.50	210.00
TOTAL FEES		35.90	\$41,957.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/3/2020	Blain, Hunter	Attend call with C. Gange and DPW regarding proofs of claim analysis.	0.20	\$117.00
8/3/2020	Gange, Caroline	Call w/ DPW re POC update (0.2); follow-up emails w/ K. Eckstein and R. Ringer re same (0.1); correspondence w/ G. Cicero re same (0.1); follow-up emails w/ DPW and AHC professionals re same (0.4).	0.80	672.00
8/4/2020	Ringer, Rachael L.	Emails with AHC professionals re: claims analysis (0.4).	0.40	460.00



## **Claims Analysis**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/4/2020	Gange, Caroline	Emails w/ AHC professionals re POC process.	0.20	168.00
8/11/2020	Ringer, Rachael L.	Attend AHC professionals call re: claims and legal issues (1.0).	1.00	1,150.00
8/11/2020	Eckstein, Kenneth H.	Call with M. Cyganowski re analysis of proofs of claim (0.5).	0.50	750.00
8/13/2020	Ringer, Rachael L.	Revise claims outline with comments from AHC professionals (0.9), numerous emails with KL team re: same (0.8), further emails with AHC members re: same (0.6).	2.30	2,645.00
8/13/2020	Stoopack, Helayne O.	Review proofs of claim (0.4).	0.40	430.00
8/14/2020	Eckstein, Kenneth H.	Call with AHC advisors re POC analysis (0.8).	0.80	1,200.00
8/19/2020	Ringer, Rachael L.	Call with Brattle re: claims analysis (1.9).	1.90	2,185.00
8/19/2020	Eckstein, Kenneth H.	Call with Brattle, clients re claim calculation issues (2.0); correspond with A. Troop re claim calculation and debtor presentation (0.6).	2.60	3,900.00
8/19/2020	Blabey, David E.	Call with NCSG and AHC professionals/Brattle re claim calculation and related presentation.	2.00	2,100.00
8/19/2020	Gange, Caroline	Attend prep call w/ Brattle, States and AHC counsel re claim calculations.	2.00	1,680.00
8/21/2020	Ringer, Rachael L.	Call with Brattle and counsel re: claims calculation (2.0).	2.00	2,300.00



# **Claims Analysis**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/21/2020	Eckstein, Kenneth H.	Call with Brattle, counsel re claim analysis (2.0).	2.00	3,000.00
8/21/2020	Blabey, David E.	Attend portion of call with AHC, NCSG and Brattle re draft claims presentation.	1.50	1,575.00
8/21/2020	Gange, Caroline	Attend portion of prep call w/ Brattle and States re claims calculation (1.5); review revised presentation re same (0.3).	1.80	1,512.00
8/22/2020	Gange, Caroline	Review background from AHC members re proof of claims and revised deck re same.	1.20	1,008.00
8/24/2020	Ringer, Rachael L.	Attend portion of claims analysis call with Debtors (1.0).	1.00	1,150.00
8/24/2020	Eckstein, Kenneth H.	Review Brattle deck, prep for meeting, calls with A. Troop, review and revise re same (1.2); attend meeting with company, experts, clients re state claim analysis (2.0); review and comment on legal memo deck re claims issues (1.3), correspond w/ J. Trachtman re same (0.2).	4.70	7,050.00
8/24/2020	Blabey, David E.	Call with Brattle Group, AHC, NCSG and Debtors' advisors re Brattle claim presentation (1.6); follow-up call with AHG and NCSG advisors (0.3).	1.90	1,995.00
8/24/2020	Gange, Caroline	Attend call w/ Brattle and debtors re claims presentation.	2.00	1,680.00
8/26/2020	Ringer, Rachael L.	Attend portion of call with KL team re: claims analysis project (0.8).	0.80	920.00



# **Claims Analysis**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/26/2020	Eckstein, Kenneth H.	Call with KL team re legal memo re claims (0.4), report same to clients (0.2), revisions to same (0.8).	1.40	2,100.00
8/26/2020	Kane, Wendy	Review and organize local government proofs of claim (0.4); emails w/ C. Gange re same (0.1).	0.50	210.00
TOTAL			35.90	\$41,957.00



## **Employment and Fee Applications**

## **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Ringer, Rachael L.	Partner	0.20	\$230.00
Blain, Hunter	Associate	2.70	1,579.50
Gange, Caroline	Associate	18.60	15,624.00
Kane, Wendy	Paralegal	1.60	672.00
TOTAL FEES		23.10	\$18,105.50

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/3/2020	Gange, Caroline	Review AHC professionals invoices for confidentiality and privilege issues, and compliance with UST guidelines.	1.60	\$1,344.00
8/4/2020	Gange, Caroline	Review June invoice for privilege & confidentiality and compliance with UST guidelines.	2.20	1,848.00
8/5/2020	Gange, Caroline	Review June monthly invoice for privilege & confidentiality and compliance w/ UST guidelines.	0.80	672.00
8/6/2020	Gange, Caroline	Review AHC professionals' June invoices.	2.50	2,100.00
8/7/2020	Blain, Hunter	Review letter from fee examiner regarding second interim fee application (0.2).	0.20	117.00
8/7/2020	Gange, Caroline	Review fee examiner's second interim report.	0.50	420.00



# **Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/7/2020	Kane, Wendy	Emails w/ billing re June fee statement (0.1); proof edits and revise same (0.3).	0.40	168.00
8/11/2020	Kane, Wendy	Review July fee statement for privilege & confidentiality and compliance with UST guidelines and local rules (1.1); emails w/billing re same (0.1).	1.20	504.00
8/12/2020	Blain, Hunter	Review June invoice for confidentiality/privilege issues and compliance with UST guidelines.	1.20	702.00
8/12/2020	Gange, Caroline	Review/revise June invoice for privilege & confidentiality and compliance with UST guidelines.	0.30	252.00
8/13/2020	Gange, Caroline	Emails w/ K. Eckstein and H. Blain re Brenkus fees.	0.20	168.00
8/14/2020	Blain, Hunter	Emails with C. Gange and billing regarding Brenkus fees (0.1).	0.10	58.50
8/14/2020	Gange, Caroline	Review June invoice re: privilege & confidentiality (1.7); emails w/ H. Blain re Brenkus fees (0.1).	1.80	1,512.00
8/16/2020	Gange, Caroline	Review/revise AHC professionals June fee statements for privilege & confidentiality and compliance with UST guidelines.	1.70	1,428.00
8/18/2020	Gange, Caroline	Review June invoice for privilege & confidentiality and compliance with UST guidelines.	1.70	1,428.00
8/19/2020	Blain, Hunter	Draft letter regarding fee examiner comments.	1.00	585.00



# **Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/19/2020	Gange, Caroline	Emails w/ DPW re interim fee hearing (0.1); review fee examiner report and proposed responses (0.3).	0.40	336.00
8/20/2020	Blain, Hunter	Review/revise July invoice for privilege/confidentiality issues and compliance with UST guidelines.	0.10	58.50
8/20/2020	Gange, Caroline	Correspond w/ fee examiner re second interim report (0.3); review/revise fee examiner response (0.3); emails w/ AHC counsel re same (0.2); review June invoice for privilege & confidentiality and compliance with UST guidelines (1.3).	2.10	1,764.00
8/21/2020	Ringer, Rachael L.	Coordinate with DPW re: HL fee order (0.2).	0.20	230.00
8/21/2020	Gange, Caroline	Multiple emails w/ AHC counsel re fee examiner resolutions (0.4).	0.40	336.00
8/25/2020	Blain, Hunter	Research regarding second interim fee application and communications with C. Gange re same (0.1).	0.10	58.50
8/25/2020	Gange, Caroline	Review proposed interim fee order (0.3); emails w/ DPW and AHC professionals re same (0.2); prep for hearing on fees (0.3).	0.80	672.00
8/31/2020	Gange, Caroline	Review AHC professionals June fee statements.	1.60	1,344.00
TOTAL			23.10	\$18,105.50



## Litigation

## **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	13.50	\$20,250.00
Ringer, Rachael L.	Partner	7.60	8,740.00
Blabey, David E.	Counsel	1.60	1,680.00
Blain, Hunter	Associate	1.80	1,053.00
Gange, Caroline	Associate	7.60	6,384.00
Schinfeld, Seth F.	Associate	0.10	104.00
Kane, Wendy	Paralegal	1.20	504.00
TOTAL FEES	33.40	\$38,715.00	

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/4/2020	Ringer, Rachael L.	Review NAACP intervention motion (0.3); emails with A. Troop and P. Thurmond re: same (0.2).	0.50	\$575.00
8/5/2020	Ringer, Rachael L.	Emails with Pillsbury and K. Eckstein re: NAACP issues (0.3). call with Debtors re: NAACP issues and next steps (0.5).	0.80	920.00
8/6/2020	Ringer, Rachael L.	Attend call w/ public creditors re: NAACP motion to intervene (0.6).	0.60	690.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/6/2020	Gange, Caroline	Attend call w/ public-side professionals re NAACP motion to intervene (0.6); follow-up emails w/ AHC professionals re same (0.4).	1.00	840.00
8/7/2020	Ringer, Rachael L.	Attend call w/ NAACP re: NAACP intervention issues (1.0).	1.00	1,150.00
8/7/2020	Eckstein, Kenneth H.	Call with NAACP counsel re intervention (1.0); follow-up emails w/ AHC counsel re same (0.2).	1.20	1,800.00
8/7/2020	Gange, Caroline	Prepare for (0.1) and attend (1.0) call w/ NAACP counsel re motion to intervene.	1.10	924.00
8/11/2020	Eckstein, Kenneth H.	Correspond with KL team re NAACP, intervention issues (0.6); call with R. Ringer re same (0.4).	1.00	1,500.00
8/12/2020	Ringer, Rachael L.	Call with DPW/Pillsbury re: NAACP (0.5).	0.50	575.00
8/12/2020	Eckstein, Kenneth H.	Call with A. Troop re NAACP motion and issues (0.7).	0.70	1,050.00
8/14/2020	Eckstein, Kenneth H.	Call with AHC advisors re NAACP (0.5), review correspondence re same (0.2).	0.70	1,050.00
8/17/2020	Eckstein, Kenneth H.	Correspond with DPW re NAACP, follow up with clients (0.6); review NAACP letter, pleadings (1.4); calls with M. Cyganowski, D. Molton, R. Ringer re same (0.7).	2.70	4,050.00
8/18/2020	Ringer, Rachael L.	Call with Debtors re: NAACP (0.5).	0.50	575.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/18/2020	Eckstein, Kenneth H.	Prepare for (0.1) and attend (0.5) call with DPW re NAACP; follow up with A. Troop, R. Ringer re same (0.4).	1.00	1,500.00
8/19/2020	Gange, Caroline	Correspond w/ DPW and AHC professionals re NAACP intervention motion (0.4).	0.40	336.00
8/20/2020	Ringer, Rachael L.	Discussion with A. Troop re: open case issues (0.1), call w/ K. Eckstein re: NAACP stipulation with the Debtors, others (0.5).	0.60	690.00
8/20/2020	Eckstein, Kenneth H.	Call with KL team re NAACP stipulation (0.5); call and correspond re same (0.6).	1.10	1,650.00
8/20/2020	Gange, Caroline	Attend call w/ DPW, NCSG and AHC re NAACP stipulation (0.4); correspond w/ R. Ringer re same (0.2); review stipulation (0.3).	0.90	756.00
8/20/2020	Schinfeld, Seth F.	Email with C. Gange re: NAACP motion to intervene (0.1).	0.10	104.00
8/21/2020	Ringer, Rachael L.	Call with DPW re: NAACP motion and next steps (0.3); review/revise stipulation (0.3); emails with K. Eckstein and C. Gange re: same (0.4).	1.00	1,150.00
8/21/2020	Eckstein, Kenneth H.	Call with DPW, A. Troop re NAACP stipulation and motion (0.5); review stipulation and review draft response (0.7).	1.20	1,800.00
8/21/2020	Blabey, David E.	Draft and edit response to NAACP motion to intervene.	1.10	1,155.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/21/2020	Gange, Caroline	Attend call w/ AHC, DPW, and NCSG re NAACP stipulation (0.4); review same (0.2); review draft statement in support of NAACP joinder (0.3); emails w/ K. Eckstein and R. Ringer re same (0.3).	1.20	1,008.00
8/23/2020	Ringer, Rachael L.	Review updates re: NAACP (0.2), review stipulation (0.3), finalize pleading for filing (0.1).	0.60	690.00
8/23/2020	Gange, Caroline	Review/revise NAACP statement (0.2); coordinate filing same (0.3); emails w/ R. Ringer re same (0.2).	0.70	588.00
8/23/2020	Kane, Wendy	Prepare statement in support of NAACP intervention motion for filing (0.4); emails w/ C. Gange re same (0.2); file same (0.2); service of same (0.3); send courtesy copy to judge (0.1).	1.20	504.00
8/24/2020	Eckstein, Kenneth H.	Review NAACP stipulation, comments, correspond re same (0.8).	0.80	1,200.00
8/24/2020	Gange, Caroline	Prepare for omnibus hearing.	0.30	252.00
8/25/2020	Eckstein, Kenneth H.	Review NAACP stipulation, finalize, and correspond re same (0.8.	0.80	1,200.00
8/25/2020	Ringer, Rachael L.	Call with A. Troop re: NAACP stipulation (0.2).	0.20	230.00
8/26/2020	Ringer, Rachael L.	Prepare for (0.1) and attend portion of hearing re: fees, Collegium, NAACP stipulation (1.2).	1.30	1,495.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/26/2020	Eckstein, Kenneth H.	Review materials and prep for court hearing (0.5); attend court hearing re NAACP stipulation, interim fee applications, and collegium stay motion (1.8).	2.30	3,450.00
8/26/2020	Blabey, David E.	Attend portion of omnibus hearing regarding NAACP motion and fees.	0.50	525.00
8/26/2020	Blain, Hunter	Attend hearing regarding NAACP motion, fee applications, and stay motions to prepare summary for distribution to Ad Hoc Committee.	1.80	1,053.00
8/26/2020	Gange, Caroline	Prep for (0.2) and attend hearing re fees and NAACP motion and emails w/ K. Eckstein throughout (1.8).	2.00	1,680.00
TOTAL	TOTAL			\$38,715.00



# Meetings and Communications with Ad-Hoc Committee & Creditors

## **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	6.00	\$9,000.00
Ringer, Rachael L.	Partner	10.60	12,190.00
Rosenbaum, Jordan M.	Partner	3.40	4,080.00
Blabey, David E.	Counsel	6.10	6,405.00
Stoopack, Helayne O.	Counsel	2.00	2,150.00
Blain, Hunter	Associate	5.80	3,393.00
Funke, Elise	Associate	1.60	1,232.00
Gange, Caroline	Associate	12.40	10,416.00
Khvatskaya, Mariya	Associate	0.80	724.00
Kontorovich, Ilya	Associate	3.90	3,529.50
Schinfeld, Seth F.	Associate	5.20	5,408.00
TOTAL FEES	57.80	\$58,527.50	

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/1/2020	Gange, Caroline	Draft AHC update email re fees and docket updates.	1.10	\$924.00
8/4/2020	Ringer, Rachael L.	Draft update email re: POCs, option agreement, NAACP, protective order (0.8); attend portion of AHC non-state update call (0.3).	1.10	1,265.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/4/2020	Gange, Caroline	Attend non-state update call (1.0); review draft AHC update from R. Ringer (0.2).	1.20	1,008.00
8/5/2020	Rosenbaum, Jordan M.	Attend portions of call with AHC regarding proof of claim update.	0.60	720.00
8/5/2020	Eckstein, Kenneth H.	Prepare for (0.2) and attend (0.8) AHC meeting re proof of claim update and option agreement; correspond with S. Gilbert, R. Ringer re agenda and issues for meeting (0.7).	1.70	2,550.00
8/5/2020	Ringer, Rachael L.	Prepare agenda for AHC meeting (0.3), emails with clients re: same (0.2), prepare for (0.5) and attend AHC meeting, lead portion of same re: numerous case issues (0.8).	1.80	2,070.00
8/5/2020	Stoopack, Helayne O.	Call with M. Khvatskaya re: AHC Committee update (0.3); follow up email re: same (0.2).	0.50	537.50
8/5/2020	Blain, Hunter	Attend AHC call regarding proofs of claim update and option agreement.	0.80	468.00
8/5/2020	Khvatskaya, Mariya	Draft summary of the AHC call from 7/29 (0.5); call with H. Stoopack re same (0.3).	0.80	724.00
8/5/2020	Schinfeld, Seth F.	Attend weekly meeting of AHC members re: mediation update and proofs of claims.	0.80	832.00
8/5/2020	Gange, Caroline	Attend weekly AHC professionals call (0.8); calls/emails w/ M. Khvatskaya re same (0.2).	1.00	840.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/11/2020	Gange, Caroline	Review district court order affirming preliminary injunction and draft update email to AHC re same.	0.90	756.00
8/12/2020	Eckstein, Kenneth H.	Attend AHC call re diligence updates and NAACP (1.2).	1.20	1,800.00
8/12/2020	Rosenbaum, Jordan M.	Prepare for (0.2) and attend (1.2) call with AHC re diligence updates and NAACP motion.	1.40	1,680.00
8/12/2020	Ringer, Rachael L.	Call with AHC members re: claims analysis (0.5); prepare agenda for AHC call (0.4); prepare for (0.3) and attend AHC call regarding NAACP motion and diligence updates (1.2).	2.40	2,760.00
8/12/2020	Blabey, David E.	Call with R. Ringer, K. Eckstein, and AHC members re plan issues and Sackler mediation.	0.50	525.00
8/12/2020	Schinfeld, Seth F.	Attend weekly meeting of AHC members re: diligence/discovery updates.	1.60	1,664.00
8/12/2020	Kontorovich, Ilya	Attend weekly Ad Hoc Committee meeting call.	1.60	1,448.00
8/12/2020	Blain, Hunter	Attend AHC call regarding NAACP joinder, diligence, and insurance stipulation.	1.60	936.00
8/12/2020	Funke, Elise	Attend AHC call re NAACP and diligence updates (1.6).	1.60	1,232.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/12/2020	Gange, Caroline	Attend (1.6) AHC weekly update call re NAACP joinder and diligence update; review agenda re same (0.2); attend call w/ FTI/HL re prep for AHC call and business plan update (0.2); multiple emails w/ FTI re same (0.3).	2.30	1,932.00
8/17/2020	Gange, Caroline	Prepare draft update to consenting states re case updates and POC process.	0.90	756.00
8/19/2020	Rosenbaum, Jordan M.	Attend call with AHC regarding proofs of claim and NAACP motion.	1.00	1,200.00
8/19/2020	Ringer, Rachael L.	Prep for AHC meeting, draft agenda and update email re same (0.5), prep for (0.3) and attend AHC call (1.0).	1.80	2,070.00
8/19/2020	Eckstein, Kenneth H.	Review agenda for AHC call (0.3), c/w R. Ringer, M. Cyganowski re agenda and issues (0.5); prepare for (0.5) and attend (1.0) AHC call re proofs of claim and NAACP motion.	2.30	3,450.00
8/19/2020	Stoopack, Helayne O.	Attend AHC Committee call re NAACP and proofs of claim (1.0).	1.00	1,075.00
8/19/2020	Schinfeld, Seth F.	Prepare for (0.1) and attend (1.0) weekly meeting of AHC members re: updates on mediation, proof of claim procedures, and recently filed motions; review emails from R. Ringer and C. Gange re: agenda and assorted materials for discussion on the call (0.3).	1.40	1,456.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/19/2020	Blain, Hunter	Prepare for (0.1) and attend AHC call regarding proof of claim status and NAACP motion to intervene (1.0).	1.10	643.50
8/19/2020	Kontorovich, Ilya	Attend portion of Ad Hoc Committee call regarding NAACP motion and POC status.	0.90	814.50
8/19/2020	Gange, Caroline	Review/revise AHC update email (0.6); attend weekly AHC call (1.0).	1.60	1,344.00
8/20/2020	Ringer, Rachael L.	Revise update email to all consenting states (0.3).	0.30	345.00
8/20/2020	Gange, Caroline	Review/revise consenting states update email (0.5).	0.50	420.00
8/21/2020	Gange, Caroline	Draft update email to AHC re NAACP statement and stipulation (0.3); emails w/ K. Eckstein and R. Ringer re same (0.3).	0.60	504.00
8/24/2020	Ringer, Rachael L.	Draft email update to AHC re: case issues (0.8), draft update to AHC re: discovery stipulation (0.5).	1.30	1,495.00
8/25/2020	Blabey, David E.	Attend AHC call with NCSG re forthcoming article about NY AG (0.3).	0.30	315.00
8/26/2020	Eckstein, Kenneth H.	Attend AHC counsel call re discovery, claim analysis, depositions, status of case issues (0.8).	0.80	1,200.00
8/26/2020	Blain, Hunter	Summarize hearing for distribution to AHC (0.6), emails with C. Gange re same (0.2).	0.80	468.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/26/2020	Gange, Caroline	Review/revise draft email to AHC members re hearing overview.	0.50	420.00
8/30/2020	Blabey, David E.	Draft update for clients on D. Sackler deposition.	0.60	630.00
8/31/2020	Rosenbaum, Jordan M.	Attend portions of call with AHC regarding discovery updates and claim presentation.	0.40	480.00
8/31/2020	Ringer, Rachael L.	Finalize and send AHC update re: depositions (0.4), prepare for (0.2) and attend/lead portions of call with AHC re: discovery, other case updates (1.3).	1.90	2,185.00
8/31/2020	Blabey, David E.	Prepare presentation to AHC regarding Sackler deposition and document discovery (3.4); attend AHC call on discovery, deposition, and other updates (1.3).	4.70	4,935.00
8/31/2020	Stoopack, Helayne O.	Attend portion of AHC Committee call re discovery updates and claim presentation.	0.50	537.50
8/31/2020	Schinfeld, Seth F.	Prepare for (0.1) and attend (1.3) meeting with AHC members re: discovery updates.	1.40	1,456.00
8/31/2020	Blain, Hunter	Prepare for (0.2) and attend (1.3) AHC meeting regarding depositions and proofs of claim.	1.50	877.50
8/31/2020	Kontorovich, Ilya	Prepare for (0.1) and attend (1.3) Ad Hoc Committee meeting regarding depositions and proofs of claim.	1.40	1,267.00



DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/31/2020	Gange, Caroline	Prep for (0.2); and attend weekly AHC meeting re depos, other updates (1.3); review AHC update emails re same (0.3).	1.80	1,512.00
TOTAL			57.80	\$58,527.50



### Plan and Disclosure Statement

## **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Bessonette, John	Partner	1.00	\$1,225.00
Eckstein, Kenneth H.	Partner	2.70	4,050.00
Rosenbaum, Jordan M.	Partner	1.10	1,320.00
Blabey, David E.	Counsel	11.10	11,655.00
Stoopack, Helayne O.	Counsel	7.30	7,847.50
Gange, Caroline	Associate	4.40	3,696.00
Khvatskaya, Mariya	Associate	4.90	4,434.50
Halpert, Jessica	Paralegal	0.40	172.00
TOTAL FEES	32.90	\$34,400.00	

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/6/2020	Rosenbaum, Jordan M.	Attend call with AHC and DPW regarding plan issues.	0.70	\$840.00
8/6/2020	Bessonette, John	Structure call with Debtors and AHC professionals (0.7); emails with KL team re Plan term sheet and RSA (0.3).	1.00	1,225.00
8/6/2020	Eckstein, Kenneth H.	Prep for (0.1) and attend call with DPW, AHC counsel re plan issues, other case issues (0.7).	0.80	1,200.00



## **Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/6/2020	Gange, Caroline	Attend call w/ DPW and AHC counsel re plan structure (1.0); follow-up emails w/ AHC counsel re same (0.2).	1.20	1,008.00
8/11/2020	Blabey, David E.	Gather background research and materials for litigation team in connection with plan memo (2.0); call with K. Eckstein, R. Ringer, J. Trachtman, and C. Gange re same (0.9); edit memo outlining key aspects of plan treatment analysis to incorporate K. Eckstein and J. Trachtman comments (1.9).	4.80	5,040.00
8/11/2020	Gange, Caroline	Attend call w/ K. Eckstein, J. Trachtman, D. Blabey and R. Ringer re claims issues and plan treatment(0.9); review D. Blabey memo re same (0.3).	1.20	1,008.00
8/13/2020	Eckstein, Kenneth H.	Review legal issues re plan treatment of claims (0.8), call w/ AHC Counsel re same (0.4).	1.20	1,800.00
8/13/2020	Blabey, David E.	Edit outline of issues for plan considerations memo (1.1); exchange multiple emails with R. Ringer, J. Trachtman, and K. Eckstein re same and review edits to same (0.5).	1.60	1,680.00
8/13/2020	Stoopack, Helayne O.	Review tax issues re: structuring (0.5).	0.50	537.50
8/13/2020	Khvatskaya, Mariya	Call with Davis Polk tax re: tax structure (0.7); review relevant documents re: same (0.6).	1.30	1,176.50



### Plan and Disclosure Statement

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/13/2020	Gange, Caroline	Attend AHC counsel call re plan issues (0.8); emails w/ J. Trachtman and K. Eckstein re same (0.2); review memo re plan issues and workstreams (0.4).	1.40	1,176.00
8/14/2020	Stoopack, Helayne O.	Call with M. Khvatskaya re: tax structuring issues (0.8); review structure re: analysis of same (1.7).	2.50	2,687.50
8/14/2020	Khvatskaya, Mariya	Call with H. Stoopack re: settlement structure (0.8).	0.80	724.00
8/18/2020	Eckstein, Kenneth H.	Correspond with DPW re plan meeting and issues (0.7).	0.70	1,050.00
8/19/2020	Khvatskaya, Mariya	Draft a summary of post- emergence structure considerations.	0.70	633.50
8/24/2020	Blabey, David E.	Edit draft presentation on plan- related issues (4.7).	4.70	4,935.00
8/24/2020	Khvatskaya, Mariya	Draft summary of tax issues for post-emergence structure.	0.70	633.50
8/26/2020	Stoopack, Helayne O.	Review post-emergence structure issues (1.3); emails with R. Ringer, M. Khvatskaya re: same (1.0).	2.30	2,472.50
8/26/2020	Khvatskaya, Mariya	Discuss post-emergence structure with H. Stoopack (0.2); revise summary of tax structure (0.3).	0.50	452.50
8/26/2020	Gange, Caroline	Attend call w/ AHC counsel re claims analysis, case updates (0.6).	0.60	504.00



## **Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
8/27/2020	Stoopack, Helayne O.	Attend call with AHC tax group re: post-emergence structure (0.9), emails with M. Khvatskaya re: same (0.2); review draft proposed structure chart and related tax issues (0.9).	2.00	2,150.00
8/27/2020	Khvatskaya, Mariya	Attend tax call with BR and FTI re: structure of post-emergence vehicles.	0.90	814.50
8/28/2020	Rosenbaum, Jordan M.	Review relevant documents re: plan structuring issues.	0.40	480.00
8/31/2020	Halpert, Jessica	Call w/ R. Goot to discuss future projects re plan.	0.40	172.00
TOTAL			32.90	\$34,400.00